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95-RF-07111
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September 13, 1995

95-RF-07111

Jessie M. Roberson, Assistant Manager
Environmental Restoration
DOE, RFFO

OPERABLE UNIT 2 (OU 2) PATH FORWARD (KH00003NS1A) - TGH-261-95

Attn: W. Fitch

Action: Request concurrence from the Environmental Protection Agency and the Colorado Department of Public Health and Environment.

The current focus of the OU 2 project is to proceed from the remedial investigation (RI), through the feasibility study (FS), proposed plan and record of decision (ROD) prior to taking remedial actions and closing this OU. The proposed strategy is that this project should be redirected to obtain quicker risk reduction and remediation, as well as to take into account declining budgets and resources. To accomplish this goal, the Kaiser-Hill, L.L.C. proposes the following strategy.

RFI/RI Report

Significant comments have been received from the Environmental Protection Agency (EPA) on the 17 volume, draft Phase II RCRA (Resource Conservation & Recovery Act) Facility Investigation/Remedial Investigation (RFI/RI) report. On August 24, 1995, extensive Colorado Department of Public Health and Environment (CDPHE) comments were received, about four weeks behind schedule. The number and significance of the comments received was surprising as almost all of the document had been previously reviewed and comments incorporated. A preliminary version of the document, without the risk assessment portions, had previously been received by the Agencies in December 1993 and comments had been incorporated. The risk assessment portions had been presented, comments incorporated, and approved in the four, Interagency Agreement (IAG)-required, risk assessment technical memorandum. The only section not previously reviewed was the nature and extent section, which was extensively rewritten since the preliminary draft. However, very few comments pertained to this section.

The impact of completely addressing the new EPA and CDPHE comments is up to six months schedule delay, and approximately \$500,000. Complete reworking of the document and data to incorporate these new comments would probably not result in a change in the document's conclusions, and the RFI/RI Report, as it is now, meets the regulatory requirements. Therefore, it is recommended that these comments be addressed simply, in an expedient manner, and minor revisions be made to the document. The final document would then consist of the draft Phase II RFI/RI Report along with these revised pages.

CMS/FS Report

This document is focused on the residual contamination in subsurface soils, surface soils and groundwater at OU 2. The trenches are the primary sources, and were addressed in the RFI/RI report but are not specifically addressed in the corrective measures study/feasibility study (CMS/FS) as these are to be remediated as removal actions. Completing this report may not be necessary, or an efficient use of resources. Two required technical memoranda have been completed but cannot be finalized due to open issues with EPA and CDPHE, especially

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REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

☒ PARTIAL OPEN
☐ CLOSED

LTR APPROVALS:

RIG. & TYPIST INITIALS:
JAKS :bag

46469 (Rev. 4/25/95)

DOCUMENT CLASSIFICATION
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Kaiser-Hill Company, L.L.C.

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Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

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Jessie M. Roberson
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concerning groundwater. However, the RFI/RI and CMS/FS effort have established that:

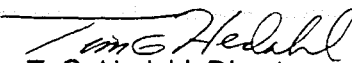
- The 903 Pad and associated soils have an unacceptable risk and should be remediated (The 903 Pad is expected to be on the Top 10 prioritization list for Environmental Restoration risks)
- Groundwater remediation will be dependent on establishing point of compliance, and Applicable or Relevant and Appropriate Requirements, and
- Subsurface soil remediation is also dependent on resolving outstanding issues.

It is proposed that the CMS/FS Report be delayed at least 6 months and that the effort towards completing this report be redirected into an Interim Measure/Interim Remedial Action (IM/IRA) for the surficial soils in the 903 Pad and surrounding area. This will be more cost effective, timely and will result in earlier mitigation of risk, rather than by first completing the CMS/FS through ROD. In addition, the 903 Pad is perceived by the public as a major problem. Remediation of this area may increase public confidence. The IM/IRA will also help satisfy the Fiscal Year 1997 (FY97) performance measure for remediation.

During the period that the CMS/FS Report is on hold, there will be a continuation of effort to develop strategies for the FY95 and FY96 performance measures to consolidate the OUs and sitewide groundwater and will actively pursue implementing these cost saving measures. At that time, the OU 2 groundwater and subsurface soils may be consolidated into the appropriate sitewide programs. If this is accomplished, the OU 2 CMS/FS and other milestones should be canceled. All information derived for the OU 2 project will be utilized by the sitewide programs when appropriate. The sitewide program will evaluate remediation alternatives for all Individual Hazardous Substance Sites which will not be remediated as accelerated actions.

Kaiser-Hill, L.L.C. is committed to pursuing efficient and cost effective risk reduction at OU 2. We feel that the above strategy will accomplish this goal. As we have already begun to implement a soils IM/IRA, we need to meet with and obtain concurrence from the Department of Energy/Rocky Flats Field Office, EPA and CDPHE. Please let us know immediately if you do not agree with this.

If you have any questions or need additional information, please contact Ann Sieben at X9886.


T. G. Hedahl, Director
ER/WM&I Operations

AKS:bag

Orig. and 1 cc - J. M. Roberson

Attachment:

1. Draft letter to EPA and CDPHE

DRAFT

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

The current focus of the OU 2 project is to proceed from the remedial investigation (RI), through the feasibility study (FS), proposed plan and record of decision (ROD) prior to taking remedial actions and closing this OU. The proposed strategy is that this project should be redirected to obtain quicker risk reduction and remediation, as well as to take into account declining budgets and resources. To accomplish this goal, the Department of Energy/Rocky Flats Field Office (DOE/RFFO) proposes the following strategy.

RFI/RI Report

Significant comments have been received from the Environmental Protection Agency (EPA) on the 17 volume, draft Phase II RCRA (Resource Conservation & Recovery Act) Facility Investigation/Remedial Investigation (RFI/RI) report. On August 24, 1995, extensive Colorado Department of Public Health and Environment (CDPHE) comments were received. A preliminary version of the document, without the risk assessment portions, had previously been received by the Agencies in December 1993 and comments had been incorporated. The risk assessment portions had been presented, comments incorporated, and approved in the four, Interagency Agreement (IAG)-required, risk assessment technical memorandum. The only section not previously reviewed was the nature and extent section, which was extensively rewritten since the preliminary draft. However, very few comments pertained to this section.

The impact of completely addressing the new EPA and CDPHE comments is up to six months schedule delay, and approximately \$500,000. Complete reworking of the document and data to incorporate these new comments would probably not result in a change in the document's conclusions, and the RFI/RI Report, as it is now, meets the regulatory requirements. Therefore, DOE/RFFO recommends that these comments be addressed simply, in an expedient manner, and minor revisions be made to the document. The final document would then consist of the draft Phase II RFI/RI Report along with these revised pages.

CMS/FS Report

This document is focused on the residual contamination in subsurface soils, surface soils and groundwater at OU 2. The trenches are the primary sources, and were addressed in the RFI/RI report but are not specifically addressed in the corrective measures study/feasibility study CMS/FS as these are to be remediated as removal actions. Completing this report may not be

necessary, or an efficient use of resources. Two required technical memorandum have been completed but cannot be finalized due to open issues with EPA and CDPHE, especially concerning groundwater. However, the RFI/RI and CMS/FS effort have established that:

- The 903 Pad and associated soils have an unacceptable risk and should be remediated. (The 903 Pad is expected to be on the Top 10 prioritization list for Environmental Restoration risks)
- Groundwater remediation will be dependent on establishing point of compliance, and Applicable or Relevant and Appropriate Requirements
- Subsurface soil remediation is also dependent on resolving outstanding issues.

DOE/RFFO proposes that the CMS/FS Report be delayed at least 6 months and that the effort towards completing this report be redirected into an Interim Measure/Interim Remedial Action (IM/IRA) for the surficial soils in the 903 Pad and surrounding area. This will be more cost effective, timely and will result in earlier mitigation of risk, rather than by first completing the CMS/FS through ROD. In addition, the 903 Pad is perceived by the public as a major problem. Remediation of this area may increase public confidence. The IM/IRA will also help satisfy the Fiscal Year 1997 (FY97) performance measure for remediation.

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DOE/RFFO is committed to pursuing efficient and cost effective risk reduction at OU 2. We feel that the above strategy will accomplish this goal. As we have already begun to implement a soils IM/IRA, we need to meet with and obtain concurrence the EPA and CDPHE. Please let us know immediately if you do not agree with our strategy.

If you have any questions or need additional information, please contact _____ at extension _____.

Sincerely,

Jessie M. Roberson
Assistant Manager
Environmental Restoration